

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:23-cr-00535
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	
)	
DANIEL KOVACIC,)	<u>DEFENDANT'S MOTION TO</u>
)	<u>CONTINUE TRIAL</u>
Defendant.)	
)	

Now comes the Defendant Daniel Kovacic, by and through his undersigned counsel Marisa L. Serrat, and hereby respectfully requests this Honorable Court to continue the trial, currently scheduled for March 24, 2025. The defense requests that the Defendant's trial date be continued to May 12, 2025, or to another date that is convenient for this Honorable Court. Counsel has discussed this request with AUSA Brian S. Deckert who has indicated that the government does not oppose this request.

The defense has filed extensive pretrial Motions that are currently pending before this Honorable Court. (R. 43, Motion to Suppress Search of Wickliffe Residence, Motion to Dismiss) (R. 42, Motion to Suppress Search of Black Samsung S23 Cellular Phone) (Motion to Dismiss the Indictment). The government has filed its responses in opposition and the defense has filed reply briefs. The defense respectfully requests this Honorable Court to continue the trial date to allow the parties sufficient time to prepare for trial after the Court issues its rulings on the Defendant's pending Motions. This request for continuance is made in good faith and for the purpose of promoting the ends of justice.

Mr. Kovacic has been advised that he is entitled to the commencement of a trial within seventy (70) days after his arraignment, or the filing of an indictment, whichever occurs later; or that the case against him shall be dismissed pursuant to the Speedy Trial Act. In the instant case, having full knowledge of the particulars of the Speedy Trial Act as they relate to the dismissal of cases for failure to commence trial, the defendant respectfully submits that the interests of justice will be best served by granting the continuance requested herein.

Based upon the foregoing, the Defendant respectfully request this Honorable Court to continue the trial to May 12, 2025, or to another date that is convenient for the Court.

Respectfully Submitted,

s/ Marisa L. Serrat
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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Marisa L. Serrat
JAIME P. SERRAT LLC
Marisa L. Serrat, (#00888410)